

# PROPOSED RESOLUTION

Resolution W-5074  
DWA

Agenda ID #14610 Rev. 2  
Item #18

## PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DIVISION OF WATER AND AUDITS  
Water and Sewer Advisory Branch

RESOLUTION W-5074  
February 25, 2016

### RESOLUTION

(RES. W-5074). APPEALS OF THE DIVISION OF WATER AND AUDITS DISPOSITIONS OF VARIOUS ADVICE LETTERS UPDATING RULE 14.1 AND ADOPTING SCHEDULE 14.1 FOR CALIFORNIA-AMERICAN WATER COMPANY, CALIFORNIA WATER SERVICES COMPANY, GOLDEN STATE WATER COMPANY, AND SAN JOSE WATER COMPANY.

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### SUMMARY

The Division of Water and Audits (DWA) approved various advice letters updating Rule 14.1 and adopting Schedule 14.1 for California-American Water Company (Cal-Am), California Water Services Company (Cal Water), Golden State Water Company (GSWC), and San Jose Water Company (SJWC) in response to mandatory water rationing pursuant to Resolutions (Res.) W-5034 and W-5041. The Office of Ratepayer Advocates (ORA) and customers of GSWC and SJWC filed appeals of DWA's dispositions.

This Resolution affirms DWA's approval of provisions in Rule 14.1 and Schedule 14.1 that would have drought surcharges or penalties accounted for in the Water Revenue Adjustment Mechanisms of Cal-Am, Cal Water, and GSWC. The approval of these provisions is consistent with the direction and order given by Res. W-4976.

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Further, this resolution affirms DWA's approval of Schedule 14.1 for SJWC that includes implementation of a drought surcharge program that applies only to residential and a number of "landscape services" customers' water use.

## **BACKGROUND**

In Res. W-4976, we adopted drought procedures for water conservation and mandatory rationing which prescribe the process for establishing Tariff Rule 14.1, by which utilities can introduce voluntary conservation measures, and Schedule 14.1, which provides for mandatory rationing if voluntary measures do not yield the necessary reduction in consumption, or in circumstances of a prolonged or severe drought. The procedures are attached as Attachments A, B and C to Res. W-4976.

On April 9, 2015, the Commission issued Res. W-5034 ordering water utility compliance with the State Water Resources Control Board's (Water Board) Resolution No. 2015-0013 adopting a new 2015 emergency regulation for statewide urban water conservation and re-adopting the 2014 emergency regulation as codified in the California Code of Regulations, Title 23, Sections 863, 864, and 865. Ordering Paragraph No. 6 of Res. W-5034 ordered all Class A and B water utilities to add Schedule 14.1 to their tariffs, as soon as practicable, by filing a Tier 2 advice letter.

Before either the Water Board's Resolution 2015-0013 or the Commission's Res. W-5034 were in effect, Governor Edmond G. Brown Jr. issued an Executive Order B-29-15 (EO) on April 1, 2015 ordering that all of the 2014 and 2015 emergency regulations to date were to remain in full force and effect and mandating further reduction in potable

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water use through February 28, 2016. The EO orders the Water Board and the Commission to impose restrictions on both the urban water suppliers and the investor-owned utilities to achieve a statewide 25% reduction in potable urban water use and to direct the suppliers and utilities to develop rate structures and other pricing mechanisms to maximize water conservation to achieve the 25% reduction, along with monetary penalties to the water agencies and water utilities for failure to comply. The EO directs that reductions should take into consideration the relative per capita water use of each water suppliers'/utilities' service area such that those with high per capital use are required to achieve proportionately greater reductions than those with less use. The EO further directs urban water suppliers/utilities to develop rate structures and other pricing mechanisms, including surcharges, fees, penalties, or other mechanisms, to maximize 25% water conservation.

In response to the EO, the Water Board on May 5, 2015 issued Resolution No. 2015-0032 and the Commission on May 7, 2015 issued Res. W-5041. The Water Board's Resolution No. 2015-0032 implements the requirements called for in the EO, including setting water use reductions based on per capita water use in each water suppliers'/utilities service area. Res. W-5041 orders all water utilities subject to Commission jurisdiction to comply with the emergency regulations adopted by the Water Board by Resolution No. 2015-0032. The Class A water utilities whose filings are the subject of this Resolution filed advice letters in compliance with Res. W-5034 and W-5041 during April, May, and June 2015. The advice letters implemented water shortage contingency plans with staged mandatory reductions and drought surcharges in addition to the water use restrictions established in earlier emergency

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regulations by the Water Board through the establishment of Schedule 14.1 in each of their tariffs.

## **APPEALS**

ORA and numerous customers from GSWC and SJWC filed timely appeals of DWA's dispositions approving advice letters updating Rule 14.1 and adopting Schedule 14.1 for Cal-Am, Cal Water, GSWC, and SJWC. Three issues were raised in the appeals. First, ORA argues Cal-Am, Cal Water, and GSWC in their Schedule 14.1s propose to account for drought surcharge revenues as part of their Water Revenue Adjustment Mechanism (WRAM) which ORA contends is contrary to Res. W-4976 which directs that monies collected from water use violation fines be accounted for in a separate memorandum account. Second, customers claimed that SJWC's and GSWC's implementation of the monthly drought allotment, including SJWC's use of average customer water usage as opposed to a customer-specific allotment, is both discriminatory and unreasonable. Third, ORA and SJWC customers raised concerns that SJWC's implementation of its drought surcharge program, by excluding non-residential customers, is unreasonable, discriminatory and preferential.

## **DISCUSSION**

We will address each of the three issues on appeal below.

### *Accounting for Drought Surcharge Revenues*

ORA in its appeal argues that the Schedule 14.1s for Cal-Am, Cal Water,, and GSWC indicate that all monies collected by the utility for water use violations of drought

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allotments through implementation of surcharges would be booked to the Water Revenue Adjustment Mechanism (WRAM) in noncompliance with Commission Res. W-4976, more specifically Attachment A to Res. W-4976.

Attachment A to Res. 4976 at pg. 9, Paragraph No. 24 , provides that “All monies collected by the utility through water use violation fines shall not be accounted for as income but rather booked to a memorandum account to offset authorized expenses incurred and lost revenues from reduced sales due to conservation or rationing”. This section goes on to explain that utility expenses incurred by a utility to activate both Rule 14.1 voluntary conservation and Schedule 14.1 mandatory rationing efforts not considered in a General Rate Case or other proceeding, shall be recoverable by a utility if determined to be reasonable by the Commission. Further, Res. W-4976 provides that these monies shall be accumulated by the utility in a separate memorandum account for disposition as directed or authorized from time to time by the Commission.

Quoting from Attachment A, ORA argues that Cal-AM, Cal Water, and GSWC in their Schedule 14.1s incorrectly propose to account for drought surcharge revenues as part of their WRAMs. ORA contends that surcharges should be held separately from existing WRAM accounts.

In response to ORA, Cal Water argues that Res. W-4976 does not require that surcharges be tracked in a memorandum account, and that there is a distinction between the surcharges which are applied to volumetric water usage and fines. Cal Water explains that surcharges are volumetric related revenues, while fines result from water use violations. Cal Am in its response on the same issue contends that Attachment A, p. 8, describes water use infractions that may consist of fines. Similar

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to Cal Water, Cal Am explains that there is a second category which includes surcharges for exceeding volumetric allotment, and these surcharges may be booked into the WRAM.

The uncertainty of whether surcharges can be included in WRAMs or must be included in memorandum accounts is not particularly well defined by the language in Res. W-4976, Attachment A. Valid arguments support accounting for surcharge revenues in WRAMs as volumetric related revenues or as a fine in a memorandum account. It is noted that while accounting for surcharge revenues in a memorandum account allows for future review of reasonableness, the WRAMs are also reviewed for reasonableness. A difference, however, is that recovery of amounts in memorandum accounts require a Tier 3 Advice Letter, while WRAM recoveries are Tier 1 advice letters.

In reviewing Res. W-4976, Attachment A, paragraphs No. 35 and No. 38 address the tracking of expenses and “monies collected by the utility through water use violation fines” and “penalties collected”. In both cases Res.W-4976 directs utilities to establish memorandum accounts for recording these amounts. However, in reviewing these paragraphs, and the afore quoted Paragraph 24, as well as the remainder of Res. W-4976, the Commission finds no language that specifically prohibits including surcharge revenues in the WRAM. Surcharge revenues are accumulated as a result of customers exceeding their allotted volumetric usage. While the surcharge rates that result in surcharge revenues are significant when compared to other tariffed rates, the same is true of tiered rates for which the next higher tier is greater on a per unit or volumetric basis. It has long been established that such

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increasing tiered rate blocks are intended to encourage conservation. In the same way, the surcharges which are applied to customer usage do not prohibit the use of water, but instead act to encourage conservation of water which is the goal of Res. W-4976. However, there are specific uses of water which are prohibited. These prohibited uses are fully discussed in Res. W-5000, and these prohibited uses can result in violations and accordingly are subject to potential fines. These fines should be booked to appropriate memorandum account.

Therefore, the Commission clarifies that any fines due to violations as described in Res. W-5000 should be accounted for in an appropriate memorandum account, while drought surcharge revenues which result from revenues collected due to usage that exceeds an allowable quantity may be charged to either an appropriate memorandum account, or credited to the established WRAM account .

### *Implementation of Residential Monthly Drought Allotment*

Two hundred and twenty customers filed timely appeals to DWA's disposition of SJWC's implementation of the monthly drought allotments for residential customers as provided for in Schedule 14.1. In addition, two customers filed timely appeals to DWA's disposition of GSWC's implementation of the monthly drought allotments.

Issues raised in the appeals ranged from the impacts the drought allotments have in specific circumstances to the size of the required water reductions underlying the allotments and the criteria used for calculating drought allotments. Customer concerns with the impact drought allotments have are specific to individual customer circumstances and are not an appropriate matter for a Commission review of DWA's disposition of advice letters authorizing the establishment of Schedule 14.1 for SJWC

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and GSWC. Schedule 14.1 provides a procedure for customers seeking an allotment variance request if the designated allotment would create either an undue customer hardship or an unjust or unreasonable result. Customers need to first seek an adjustment to their allotment through a written request to the utility. The utility shall reply in writing to all such requests. If the customer disagrees with the utility's disposition, the customer has the right to file a formal complaint with the Commission. As such, allotment appeals based on individual circumstances are denied without prejudice for customers to pursue these matters under the procedure provided for in Schedule 14.1

Appeals addressing concerns with the size of the mandatory water reductions that underlie customer allotments are also denied. The mandatory reductions ordered by the Water Board are based on average per capita historic water use in each of the utilities' service areas in order to achieve a 25% reduction on a state-wide basis as ordered in the Governor's April 1, 2015 EO. Higher per capita water use areas are given higher mandatory reductions, as high as 36% in some areas compared to 2013 usage. Lower per capita water use areas have lower mandatory reductions, as low as 8%. We issued Res. W-5041 requiring all urban water supplier utilities to comply with the Water Board's mandated reductions. For SJWC, its water wholesaler, Santa Clara Valley Water District, mandated 30% reductions given local water supply conditions. This is higher than the 20% reduction called for by the Water Board for SJWC's service area. A review of the mandated reductions implemented by GSWC and SJWC in their Schedule 14.1s are consistent with the reductions ordered by the Water Board and the Santa Clara Valley Water District, respectively.



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Finally, numerous SJWC's customers appealed DWA's disposition approving SJWC's Schedule 14.1 wherein all residential allotments are based on a 2013 average customer water use as opposed to using individual customer 2013 water use as proposed by some utilities. Customers with above-average use would be forced to reduce their water consumption by more than 30% to fall within the residential allotment plan and thus avoid paying a drought surcharge for excess water use. Customers with average or below-average water use would need to reduce their water consumption by 30% or less to avoid paying a drought surcharge for excess water use.

No one water allotment is either perfect or fair for all customers. All have characteristics that can be either recommended or criticized. SJWC was not alone in proposing an allotment based on 2013 average customer use. It is true that customers with above-average water use will be responsible for larger water use reductions compared to below-average water users. This is not dissimilar from the Governor's April 1, 2015 EO and the Water Board's implementation of mandatory water use reductions based on per capita use where larger water users are responsible for larger reductions in water use.

We do not find SJWC's allotment determination based on historic average customer usage to be either unreasonable or unduly discriminatory when combined with the provision in Schedule 14.1 that provides customers the ability to request an allotment variance in circumstances where an average customer allotment would create either an undue customer hardship or an unjust or unreasonable result. Further, a customer has the right to file a complaint with the Commission if she disagrees with the utility's disposition of her variance request. Given that the variance request procedure

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protects against an unreasonable result arising from the implementation of an average customer allotment, we find that SJWC's residential allotment system to be a reasonable approach to implementing the Water Board's mandatory water reductions, and deny the appeals on this issue.

### *SJWC's Implementation of its Drought Surcharge Program*

ORA and various SJWC customers appealed DWA's disposition approving SJWC's Schedule 14.1 wherein SJWC excluded non-residential customers from an assessment of drought surcharges. ORA cites to Cal. Public Utilities Code § 728 for the proposition that the Commission shall determine and establish rates that are just and reasonable and fix rates that are discriminatory or preferential. We will examine this claim below.

Neither the Governor's April 1, 2015 EO nor the Water Board's implementation of the EO directs water providers on the specific means to accomplish the required 25% water use reduction. While Res. 5034, Ordering Paragraph 9, directs water utilities to include restrictions on water use for the top residential, commercial and industrial users, SJWC points out that the Water Board stated that "there are no specific water use reduction targets for commercial, industrial, and institutional users served by urban and all water suppliers. Water suppliers will decide how to meet their conservation standard through reductions from both residential and non-residential users. Water suppliers are encouraged to look at their commercial, institutional and

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industrial properties that irrigate outdoor ornamental landscapers with potable water for potential conservation savings.<sup>1''</sup>

While non-residential customers are responsible for approximately 40% of water use for SJWC, residential customers use 60%. Based on historic sales figures reported in SJWC's current general rate case, A.15-01-002, the percentage split between residential and non-residential customers at 60%/40% has remained quite constant since 2010. Thus it is reasonable to target the largest class of water users whose water use exceeds all of the other classes of customers combined. In determining conservation rules, SJWC and the Commission therefore have a rational basis for imposing one set of conservation rules on residential customers and another set of conservation rules on non-residential customers. Simply stated, it makes sense to achieve conservation from those customers using the greatest amount of water. The question before us is whether applying conservation rules only to residential customers and landscape service is necessarily discriminatory, and we find that it is not.

### COMMENTS

Public Utilities Code § 311(g) (1) generally requires that resolutions be served on all parties and be subject to at least 30 days public review and comment prior to a vote of

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1. <sup>1</sup>[Waterboards.ca.gov/waterrights/water issues/programs/drought/docs/emergency regulation/emergency reg fact sheet 20150428.pdf](http://Waterboards.ca.gov/waterrights/water%20issues/programs/drought/docs/emergency%20regulation/emergency%20reg%20fact%20sheet%2020150428.pdf). (SJWCRresponse to Protests of SJWC's Advice Letters Nos. 472 and 473, p. 5).

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the Commission. Accordingly, this draft Resolution was mailed for public comment on January 22, 2016.

One comment from a customer was received addressing non-residential conservation, however as explained in this resolution it is not unreasonable that conservation targets the largest class of water users which are residential customers.

## **FINDINGS AND CONCLUSIONS**

1. The Commission issued Resolution (Res.) W-4976, February 27, 2014, which adopted drought procedures for water conservation and mandatory rationing which proscribes the process of establishing Tariff Rule 14.1 and Schedule 14.1.
2. The Commission issued Resolutions W-5034 and W-5041 in response to Governor Brown's April 1, 2015 Executive Order B-29-15 and Resolutions 2015-0013 and 2015-0032 of the California Water Resources Control Board implementing emergency drought regulations and mandatory rationing for all water suppliers, including investor-owned utilities subject to the jurisdiction of the Commission.
3. In April, May, and June of 2015 in response to Commission Res. W-5034 and W-5041, California-American Water Company, California Water Services Company, Golden State Water Company, and San Jose Water Company filed Tier 2 advice letters to amend Tariff Rule 14.1 and establish Tariff Schedule 14.1 to implement water shortage contingency plans with staged mandatory water reductions and drought surcharges.

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4. The Division of Water and Audits (DWA) issued dispositions for Tier 2 advice letters approving the proposed water shortage contingency plans with staged mandatory water reductions and drought surcharges added to utility tariffs as Schedule 14.1 for California-American Water Company, California Water Services Company, Golden State Water Company, and San Jose Water Company.
5. Timely appeals to the DWA's dispositions were filed by the Office of Ratepayer Advocates (ORA), 220 customers of San Jose Water Company, and two customers of Golden State Water Company.
6. California American Water Company, California Water Services Company, and Golden State Water Company include in each of their Schedule 14.1 a statement indicating that drought surcharge revenues will be booked in their Water Revenue Adjustment Mechanism (WRAM) balancing account.
7. Res. W-4976 adopted drought procedures for water conservation and mandatory rationing. The procedures shown in Attachment A at paragraph No. 24 state that all monies collected by the utility through water use violations fines shall not be accounted for as income but be booked to a memorandum account.
8. The procedures shown in Attachment A to Resolution W-4976 at paragraph No. 35 include the tracking of drought-related expenses accrued and monies collected through water use violation fines.

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9. Paragraph No. 38 of Attachment A to Resolution W-4976 requires utilities with WRAM balancing accounts to file for the establishment of a separate memorandum account to track drought related expenses accrued and penalties collected, but does not define penalties.
10. Resolution W-4976 does not prohibit the booking of surcharges to existing WRAM accounts.
11. Surcharge revenues which result from revenues collected due to usage that exceeds an allowable quantity may be charged to either an appropriate memorandum account, or credited to the established Water Revenue Adjustment Mechanism account.
12. Fines resulting from penalties due to prohibited uses of water should be booked to an appropriate memorandum account.
13. Schedule 14.1 provides a procedure for customers seeking an allotment variance request if the designated allotment would create either an undue customer hardship or an unjust or unreasonable result.
14. Customer concerns with the impact that drought allotments have in specific customer circumstances are not an appropriate matter for a Commission review of DWA's disposition of advice letters authorizing the establishment of Schedule 14.1 for Golden State Water Company and San Jose Water Company.

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15. Customer appeals of the impact of the drought allotments in specific circumstances should be denied without prejudice to pursue these matters consistent with the Schedule 14.1 procedures for requesting an allotment variance.
16. The mandated water use reductions implemented by Golden State Water Company and San Jose Water Company in their Schedule 14.1s are consistent with the reductions ordered by the California Water Resources Control Board and the Santa Clara Valley Water District, respectively.
17. San Jose Water Company's implementation of the residential drought allotment is based on historic average customer use.
18. San Jose Water Company's customers whose water use is above average will require greater reductions in water use for consumption to be within the allotment and avoid having to pay drought surcharges.
19. Governor Brown's April 1, 2015 Executive Order B-29-15 ordered the State Water Resources Control Board (Water Board) to impose restriction on water use to achieve a statewide 25% reduction compared to the amount of water used in 2013. The restrictions should consider the relative per capita water usage of each water suppliers' service area, and require that those areas with high per capita use achieve proportionally greater reductions than those with low use.
20. The Water Board's implementation of the Governor's Executive Order B-29-15 on water suppliers in Resolution 2015-0032 is based on per capita use.

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21. San Jose Water Company's residential drought allotment is not dissimilar from Executive Order B-29-15 and Water Board's Resolution 2015-0032 implementing mandatory water use reductions based on per capita use where larger water users are responsible for larger reductions in water use.
22. San Jose Water Company's allotment determination based on historic average customer usage is neither unreasonable nor unduly discriminatory when combined with the provision in Schedule 14.1 that provides customers the ability to request an allotment variance in circumstances where an average customer allotment would create either an undue customer hardship or an unjust or unreasonable result.
23. Customer appeals of San Jose Water Company's historic average customer water use in establishing residential drought allotments should be denied.
24. San Jose Water Company's Schedule 14.1 excludes non-residential customers from having to pay drought surcharges.
25. Residential customers are responsible for approximately 60% of annual water sales, and non-residential customers are responsible for approximately 40% of annual water sales for San Jose Water Company. This percentage has remained relatively constant since 2010.
26. The Water Board stated that there are no specific water use reduction targets for commercial industrial or institutional users served by urban water suppliers.



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27. The appeals of the Office of Ratepayer Advocates and San Jose Water Company's customers on the issue of the exclusion of non-residential customers from a drought surcharge should be denied

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### **THEREFORE, IT IS ORDERED THAT:**

1. The appeals of the Division of Water and Audits disposition of various advice letters updating Rule 14.1 and Adopting Schedule 14.1 for California-American Water Company, California Water Services Company, Golden State Water Company, and San Jose Water Company are denied.

This Resolution is effective today.

I certify that the foregoing Resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on February 25, 2016; the following Commissioners voting favorably thereon:

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TIMOTHY J. SULLIVAN  
Executive Director

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## CERTIFICATE OF SERVICE

I certify that I have by either electronic mail or postal mail, this day, served a true copy of Proposed Resolution No. W-5074 on all parties in these filings or their attorneys as shown on the attached lists.

Dated January 22, 2016 at San Francisco, California.

/s/ JENNIFER PEREZ

Jennifer Perez

Parties should notify the Division of Water and Audits, Fourth Floor, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the Resolution number on which your name appears.

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